

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

TANZY BLAND

*

Plaintiff

*

v.

* Civil Action No.: SKG-02-2223

DIRECT INVESTIGATIVE SERVICES INC.*
d/b/a UNIVERSAL DIRECT SECURITY

*

Defendant

*

* * * * *

MOTION REQUESTING COSTS AND ATTORNEYS' FEES

Plaintiff, Tanzy Bland, by her attorney, Joseph T. Mallon, Jr., pursuant to Local Rule 109, requests this Court award costs and attorneys' fees in the above captioned case. Along with this motion, undersigned counsel respectfully submits an Affidavit and documentation supporting Plaintiff's request for costs in the amount of \$245.90.

In support of her request for attorneys' fees, Plaintiff submits the following. On or around July 2, 2001, Ms. Bland applied for employment with Defendant. On July 9, 2001, Defendant provided Plaintiff with a uniform, and she was assigned to work at the Safeway Food Market, located at 2610 Boston Street, Baltimore, Maryland. When she arrived at Safeway, she told her supervisor that she was six months pregnant. Defendant terminated Plaintiff on this basis.

On or around August 9, 2001, Plaintiff filed a Charge of Discrimination with the EEOC. On February 22, 2002, the EEOC found reasonable cause to believe Defendant discriminated against Plaintiff in violation of the Civil Rights Act of 1964, as amended ("Title VII"). The EEOC notified Plaintiff of her right to sue on April 12, 2002. Plaintiff filed the instant civil

action on July 3, 2002. The Court entered a default judgment on April 14, 2003. On February 24, 2004, the Court held a hearing to determine damages in this matter. The Court directed Plaintiff to file any petition for costs and fees on or before March 3, 2004.

Undersigned counsel customarily charges between \$150.00 and \$285.00 per hour for employment matters. Undersigned counsel seeks attorneys' fees in the amount of \$13,255.00 (\$275.00 x 48.2).

Attorneys with similar experience in this area of the law charge as much as \$400.00 per hour. Undersigned counsel has practiced employment law since 1992. His partner, Steven J. McCool, has practiced as an attorney since 1989. He began handling employment matters in the Civil Division of the U.S. Attorney's Office for the District of Columbia in 1996. Given the level of experience and skill of Plaintiff's attorneys, a rate of \$275.00 is fair and reasonable. Plaintiffs' attorneys' fees schedule is attached, and it was prepared in accordance with the Local Rules for Determining Lodestar Attorneys' Fees in Civil Rights and Discrimination Cases.

Wherefore, Plaintiff requests that the instant motion be granted.

Respectfully submitted,

/s/
Joseph T. Mallon, Jr.
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